

**To:** Bell, Brian[bell.brianc@epa.gov]  
**Cc:** Jann, Steven[jann.stephen@epa.gov]  
**From:** Hess, Catherine  
**Sent:** Thur 3/7/2013 8:47:51 PM  
**Subject:** RE: Prelim Draft GP for Hydrostatic Testing

Brian:

The language in 1.3(h) is intended to address new or increased discharges, and we have been working on clarifying some of the permit language/requirements. As you have noted for the hydrostatic discharges we have already addressed antidegradation in the fact sheet, because we anticipate that all of these discharges would fit under the short-term temporary exclusion. We only have a handful of these HST permits, and the reality of the situation is that they rarely ever discharge. Most companies just get the permit in case a tested pipe would actually leak. Most of them truck in the water, affix caps to either end of the pipe, test the pipe, then pump the used water back into the tanker and haul it offsite or store it until they need it again.

Does that help?

Sincerely,

Catherine Hess, Chief

Permits Administration Section

Office of Water Quality

Indiana Dept of Environmental Management

Email: chess@idem.IN.gov

Telephone: (317) 232-8704

**From:** Bell, Brian [mailto:bell.brianc@epa.gov]  
**Sent:** Thursday, March 07, 2013 3:22 PM  
**To:** Hess, Catherine  
**Cc:** Jann, Steven

**Subject:** FW: Prelim Draft GP for Hydrostatic Testing

Hi Catherine. I'm trying to close this issue so we can send the no objection letter. The remaining question that I have is whether Part 1.3 (h) addresses new and increased discharges.

I took another look at the fact sheet and found that new and increased discharges are addressed in by the anti-degradation rules.

For discharges to the Great Lakes, the permit prohibits any action that would result in a significant lowering of water quality (i.e., a new or increased discharge of a BCC or an increase permit limit for a non-BCC would require an antidegradation review). This permit limits are unchanged so there is no significant lowering of water quality.

For discharges outside the Great Lakes, the permit also prohibits a significant lowering of water quality (i.e., new or increased discharges that are neither short term, temporary nor lasting less than 12 months.). What I'm not sure of is whether any of these tests last longer than 12 months.

It appears to me that these provisions sufficiently address new and increased discharges. Please confirm.

Thanks.

Brian

**From:** Brianc Bell [<mailto:Bell.Brianc@epamail.epa.gov>]  
**Sent:** Thursday, March 07, 2013 2:05 PM  
**To:** Bell, Brian  
**Subject:** Fw: Prelim Draft GP for Hydrostatic Testing

Brian Bell  
Regional Storm Water Coordinator  
U.S. EPA Region 5  
Ph: 312-886-0981  
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----- Forwarded by Brian Bell/R5/USEPA/US on 03/07/2013 02:04 PM -----

From: "Hess, Catherine" <[CHESS@Idem.IN.gov](mailto:CHESS@Idem.IN.gov)>  
To: Brian Bell/R5/USEPA/US@EPA,  
Date: 01/15/2013 02:28 PM  
Subject: RE: Prelim Draft GP for Hydrostatic Testing

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Brian:

Sorry for the delayed response. I know we have been looking at some of the permit language internally and we would actually like to change this language in 1.3(h) to say the following:

"(h) discharges to a receiving stream when the discharge of a pollutant is determined to contribute to the impairment of the receiving stream for that pollutant as identified on the current 303(d) list of impaired waters;"

So, to answer your question, I would say that it is our intent for it to apply to an incremental increase in loading of a POC to an impaired water, when we have evidence that the receiving stream is actually impaired for the particular POC.

Catherine Hess, Chief  
Permits Administration Section  
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From: [Bell.Brian@epamail.epa.gov](mailto:Bell.Brian@epamail.epa.gov) [[mailto:Bell.Brian@epamail.epa.gov](mailto:mailto:Bell.Brian@epamail.epa.gov)]  
Sent: Monday, January 07, 2013 4:53 PM  
To: Hess, Catherine  
Subject: Prelim Draft GP for Hydrostatic Testing

Catherine,

I don't know who is responsible for this GP so I am sending this question to you. I was asked to confirm whether Part 1.3h applies to an incremental increase in loading of a POC to an impaired water or if it does not allow any discharge of a POC to an impaired water?

Thanks.

Brian Bell

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